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CONNECTICUT DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION
 RESPONSE TO PUBLIC COMMENTS
 REGARDING PROPOSED AMENDMENTS TO WILDLIFE REGULATIONS

The Department of Energy and Environmental Protection (“Department” or “DEEP”) proposes amendments to Sections 23-5c-1, 26-16-3a, 26-55-4, 26-66-1, 26-66-3, 26-66-4, 26-66-5, 26-66-7, 26-66-12, 26-66-13, 26-86a-2, and 26-86a-6 of the Regulations of Connecticut State Agencies; and the addition of section 26-55-7.

Public Comments Received, Department’s Response and Recommended Revisions

A public comment period began April 12th, 2019 and ended May 13th, 2019. This comment period was later extended to 5:00 p.m. May 29th, 2019. Fourteen individuals and two organizations (The National Wild Turkey Federation and The Connecticut Trappers Association) submitted comments during the comment period. The Department held a public hearing to receive additional comments on the proposed amendments on May 29th, 2019. No one from the public attended the public hearing and it was adjourned at 10:15 a.m. An additional comment and some general questions were received outside of the comment period or through unofficial means. These comments and questions were not dissimilar to official comments received and are adequately addressed in the Department’s response herein.

Comments submitted are organized by Section below, followed by the Department’s response and recommended amendments, if any. In cases where an individual or organization submitted comments on multiple sections, the comments were repeated for each Section, or parts of their comments were excerpted and presented with the related Sections. The name of the commenter is provided parenthetically.

Sec. 26-16-3a. Limitations of Public Use of State Controlled Wildlife Management Areas

Supporting Comments:

“This proposal is good policy and I would also urge the commissioner to enact a permanent ban as a better policy in the future if the opportunity arises.” (Todd G. Berch)

Department response: The authority to impose a temporary alcohol ban at wildlife management areas is consistent with the approach employed for state parks in many locations.

Recommended revisions to the proposal: None.

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Sec. 26-55-4. Importation and possession of deer, moose, and elk carcasses and parts***Opposing Comments:***

“I would oppose Sec.26-55-4 regulation prohibiting the use of commercially available natural deer products such as urine. Commercial deer products are produced and bottled on controlled deer farms and not collected from wild deer. The products undergo a stabilization and preservation process that would not support the CWD culture to thrive. Consequently, there is no research supporting that CWD HAS been spread from commercial deer attractants. [*sic*]” (Ron Szrejna)

Department response: There is no mandatory CWD testing required at captive facilities (deer farms). CWD was first documented on a deer farm and much of the spread of CWD has been linked to the movement of captive deer from one deer farm to another. Also, commercial deer urine products do not go through any stabilization or preservation process that would kill prions. CWD prions have been found in urine of infected deer in multiple studies.

Recommended revisions to the proposal: None.

(New) Sec. 26-55-7. Importation, transportation or liberation of commercially-obtained butterflies

Recommended revisions to proposal: Although no comments were received concerning this section, the Hearing Officer recommends making a change to the first sentence in 26-55-7(b)(1), removing the phrase “have a permit from” and replacing it with “be permitted by”.

Sec. 26-66-1. Behavior and Actions of Hunters***Supporting Comments:***

- “I would support the following changes in Sec.26-66-1 allowing opening day to be consistent with any other day during the regulated hunting season.” (Ron Szrejna)
- “Just noticed while reading that there are still three mentions of Quadrupeds: 26-66-1 (a) and (j), and 26-66-3, in the title. Otherwise, nicely done! [*sic*]” (Susan Unger)

Department response: The history of 26-66 includes Public Act 81-103 which authorized the commissioner to regulate “the taking of all species of wildlife” where before authorization was to regulate “hunting for all species of game birds and wild quadrupeds”.

Recommended revisions to proposal: Section 26-66-1(a) should be revised to change the word “quadrupeds” to “mammals”. Section 26-66-1(j) should be revised to change the word “quadruped” to “mammal”.

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Sec. 26-66-3. Open Hunting Seasons and Bag Limits for Upland Game Birds and Quadrupeds***Supporting Comments:***

- “I would support the following changes in Sec.26-66-3 allowing the use of hunting dogs for either training or hunting to begin one-half hour before sunrise.” (Ron Szrejna)
- “Just noticed while reading that there are still three mentions of Quadrupeds: 26-66-1 (a) and (j), and 26-66-3, in the title. Otherwise, nicely done! [*sic*]” (Susan Unger)

Department response: The history of 26-66 includes Public Act 81-103 which authorized the commissioner to regulate “the taking of all species of wildlife” where before authorization was to regulate “hunting for all species of game birds and wild quadrupeds”.

Recommended revisions to proposal: The title of Section 26-66-3 should be revised to change the word “quadrupeds” to “mammals”.

Also, the Hearing Officer recommends that in Section 26-66-3(f) *felis concolor* be italicized and *felis* capitalized to comply with nomenclature standards for scientific names of species.

Sec. 26-66-4. Wild Fowl and Shore Birds***Opposing Comments:***

“... please reconsider closing any more waterfowl Hunting areas, the state has great rules already on the books concerning the safety of our community- those pursuing waterfowl within the prescripts of the regulation cause no undue hardship or pose any safty concern to others & I fear we are losing more access year after year, these body's of water are inherently public due to there navigability or tidal properties & it's sad that generations to come will not get to appreciate waterfowl Hunting as it once was. Such a lose hurts both the waterfowl & the hunter- as the number of waterfowl hunters resulting in less funds for wildlife. & With a general increase in development & already devastating amount of wet land lost to development- these closure serve only to hurt what you intend to protect. [*sic*]” (Harrison Hastings)

Department response: The Department supports waterfowl hunting as a safe recreational activities. The Department has a process in place for reviewing and evaluating public safety issues, and uses very specific standards and criteria for making determinations about closing areas to waterfowl hunting.

Recommended revisions to proposal: There are no changes recommended based on comments received, however, the Hearing Officer recommends correcting the spelling of “southern most” to “southernmost” in Sec. 26-66-4(w)(4)

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Sec. 26-66-5. Trapping. General***Supporting Comments:***

- “I support the mandatory carcass requirement for fisher tagging.” (Herb Sobanski)
- “I have no problem with carcass collection.” (Wayne Petroskey)
- “The Connecticut Trappers Association established in 1967, wholeheartedly supports the following proposed amendments to the Connecticut Department of Energy and Environmental Protection Regulations Concerning Wildlife Including Regulations of State Agencies: Sec.26-66-5. Trapping General: This section is amended to require trappers to submit fisher carcasses for research purposes. [sic]” (Fred Becker, Connecticut Trappers Association.)
- “If more biological data is needed to determine the population of fishers in the state, then mandatory carcass collection is very logical step which I strongly support. Once carcass collection is implemented, the plethora of data obtained from those carcasses will allow biologists to make a more informed decision since they will have been able to analyze all fisher harvested within the state. I also suggest that the mandatory carcass collection be strictly enforced, otherwise compliance will be low.” (Branden Bergeron)

Opposing Comments:

- “Sect 26-66-5(d). The requirement requiring producing a Fisher carcass prior to having the pelt tagged needs additional supplier discussion to ensure the carcass is presented in a suitable condition for the Commissioner's purpose for collection. For example, is it acceptable to provide a frozen or fresh. (aged) carcass? Has DEEP contacted trappers to work out a process whereby the person who harvests a Fisher in not unduly inconvenienced when producing the carcass and pelt to the Commissioner's representative? May the carcass be presented to the Commissioner/representative prior to producing the pelt for tagging? Many questions need to be answered so the requirements may be carried out to meet the Agency's intent. [sic]” (anonymous)
- “I would oppose Sec.26-66-5 regulation requiring trappers to submit fisher carcasses for research purposes until such time that current research from carcasses having been collected since 2005 be made available to the public and support reasoning to mandate carcass collection. In 14 years of data collection what have biologists learned and what impact has the reintroduction of fishers had on wildlife. I have personally found a lack of support and effort from the Wildlife Division to collect fisher carcasses. Many times trappers have limited time to drive to one or two collection sites. [sic]” (Ron Szrejna)

Department response: Harvest data, trapper survey data, fisher sightings, and fisher roadkill data all indicate a declining fisher population. All data has been summarized, published in Federal Aid annual reports, and is available to the public. Briefly, in a healthy fisher population harvest you would expect to see an adult female to juvenile ratio of 1:3. Here in Connecticut, we have been seeing a ratio close to 1:1 in our harvest, which strongly suggests overharvest. With low compliance in carcass submission, these

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numbers are based on small sample sizes, but the ratio has been consistent. Along with the 1:1 ratio that suggest overharvest, there has been a steady decline in harvest since the season was initiated. The decline is not statistically correlated with fur prices or trapper effort. Based on the annual trapper survey, licensed trappers also believe the fisher population has declined. Road kill reports and public sightings have also declined to nearly 0 since the harvest began. DEEP staff regularly attend Connecticut trapping organization meetings and often meet one on one with most trappers to tag pelts. There are many opportunities for trappers to directly interact with furbearer program staff.

Carcasses may be submitted fresh or frozen and may be submitted before or at the time of pelt tagging. Guideline for submitting carcasses will be mailed to all trappers.

Recommended revisions to proposal: None.

Sec. 26-66-7. Seasons and bag limits for trapping furbearing animals

Supporting Comments:

- “I support the proposed Fisher bag limit reduction from 4 to 2 per season. This is an environmentally prudent decision. [sic]” (Scott Kneeland)
- “The Connecticut Trappers Association established in 1967, wholeheartedly supports the following proposed amendments to the Connecticut Department of Energy and Environmental Protection Regulations Concerning Wildlife Including Regulations of State Agencies: Sec.26-66-7 Seasons and bag limits for trapping furbearing animals: This section is amended to reduce the season bag limit for fisher from four to two. [sic]” (Fred Becker, Connecticut Trappers Association)

Opposing Comments:

- “I am opposed to the change of the fisher bag limit from 4 to 2... There has not been any notification to licensed trappers regarding the scientific reasoning behind the need to change the current regulation and of 4 fisher to 2. Without an informed decision to support the change of this regulation I can only oppose it and believe that the reasoning for this change could be one of the following:
 1. Punitive to trappers not submitting carcasses over the past years
 2. Suspicion that the fisher population is dropping [sic]” (Herb Sobanski)
- “I oppose the reduction in fisher bag limit. If more biological data is needed to determine the population of fishers in the state, then mandatory carcass collection is very logical step which I strongly support. Once carcass collection is implemented, the plethora of data obtained from those carcasses will allow biologists to make a more informed decision since they will have been able to analyze all fisher harvested within the state.” (Branden Bergeron)

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- “I also oppose the reduction in fisher bag limits without a reason being given. I suspect you may think the population is dropping, but that can be borne out in surveys. [sic]” (Wayne Petroskey)
- “I object to reducing the annual harvest of Fisher from 4 to 2. The Agency is making this decision in an arbitrary and capricious manner, I believe using questionable justification that the current limit adversely affects the harvestable population. Many factors affect whether or not trappers pursue any furbearing animal, including weather, market, market of other furbearers, available land access, etc. Historical tagging data are too unpredictable. Trappers should be much more involved in making harvest decisions. Request DEEP holds public meetings be better informed to make fisher harvest decisions. [sic]” (Anonymous)
- “I would oppose the following change in Sec.26-66-7 reduction of season bag limit of fishers from 4 to 2. I will reiterate that after 14 years of collecting carcasses and data on fishers what conclusions warrant these reductions? [sic]” (Ron Szrejna)

Department response: Harvest data, trapper survey data, fisher sightings, and fisher roadkill data all indicate a declining fisher population. All data has been summarized, published in Federal Aid annual reports, and is available to the public. Briefly, in a healthy fisher population harvest you would expect to see an adult female to juvenile ratio of 1:3. Here in Connecticut, we have been seeing a ratio close to 1:1 in our harvest, which strongly suggests overharvest. With low compliance in carcass submission, these numbers are based on small sample sizes, but the ratio has been consistent. Along with the 1:1 ratio that suggest overharvest, there has been a steady decline in harvest since the season was initiated. The decline is not statistically correlated with fur prices or trapper effort. Based on the annual trapper survey, licensed trappers also believe the fisher population has declined. Road kill reports and public sightings have also declined to nearly 0 since the harvest began. DEEP staff regularly attend Connecticut trapping organization meetings and often meet one-on-one with most trappers to tag pelts. There are many opportunities for trappers to directly interact with furbearer program staff.

Carcasses may be submitted fresh or frozen and may be submitted before or at the time of pelt tagging. Guideline for submitting carcasses will be mailed to all trappers.

Recommended revisions to proposal: The Hearing Officer recommends that in Section 26-66-7(c) *felis concolor* be italicized and *felis* capitalized to comply with nomenclature standards for scientific names of species.

Sec. 26-66-12. Wild Turkey Seasons, Bag Limits, Firearms, Ammunition, Archery Equipment, Methods, Permits, Tags and Reporting

Supporting Comments:

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- “This proposals is long overdue and I urge adoption as this will afford individuals further access to pursue recreational spring turkey harvesting, as well as eliminating season and limit confusion. [sic]” (Todd G. Berch)
- “I strongly support the expansion of turkey hunting hours under Sec. 26- 66-12...Expanding hunting hours provides additional opportunities to harvest birds while preserving the overall harvest goals of an area. Those restricted to work and school schedules may have a chance to pursue a bird that otherwise would not exist, bringing new hunters into the sport. This expansion coincides with the state's R3 campaign to promote hunting/fishing and reflects the fact that noon is an arbitrary limit. The expansion of hunting hours only on private land or by 2 hours would be a welcome compromise as well, though a universal expansion would be preferred.”(Christopher Zins)
- “I would support Sec.26-66-12 regulation extending time to hunt turkeys and increasing bag limits. [sic]” (Ron Szejna)
- I would like to be able to hunt turkeys all day because of my work schedule.” (Tim Nicoletti)
- “The NWTF requests that DEEP consider a cautious and conservative approach to expanding opportunities during the spring season. NWTF supports expanding hunting hours during the spring season. We believe expanded shooting hours further incentivizes participation and grants increased flexibility for hunters to accommodate busy schedules, poor weather etc. However, we encourage DEEP to consider this as a stand-alone expansion of opportunity rather than a part of a package along with the proposed adjustments to the bag limit during the spring season.... The NWTF supports CT DEEP's efforts to manage the wild turkey resource and exploring opportunities to recruit, retain and reactivate hunters. We agree that expanding hunting hours is an avenue to increase participation in spring turkey hunting. [sic]” (John June, Connecticut State Chapter president, National Wild Turkey Federation)

Opposing Comments:

- “I strongly oppose the proposed regulation changes in regards to the turkey hunting bag limits and shooting hours. CT already has the highest combined bag limits for turkeys in the entire country. Currently, a hunter in this state can harvest up to 11 turkeys a year. Most surrounding states like New York, Massachusetts, Vermont, Maine, and Rhode Island over 2 two bird spring limit and 1-2 birds in the fall. There is no need for CT hunters to be allowed to harvest 3 times as many. The combined spring limit of 2 on state and 3 on private is already too high. We don't need to allow more birds being harvested off state lands. Allowing 5 turkeys in the spring season off state land would ruin a lot of hunting opportunity for hunters down the road and would put more stress on an already declining turkey population. State lands in the passed few seasons have seen a big increase in hunters due to the permit and stamp changes that now gives each hunter 5 tags in one shot instead of buying them separately. Additionally, increasing the shooting hours until sunset will do the same as hunters will now be able to just sit near roost sites and harvest turkeys that wouldnt have been harvested. Multiple studies have shown that over

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harvest of male turkeys can cause major declines in population. CT is a great state to turkey hunt in, but these new regulations would greatly effect that, specifically on state land where most hunters, including non-residents, spend their time hunting. These regulation changes would be detrimental to CT turkey hunters and the turkey population in this state. [sic]" (Daniel Marino)

- "...strongly oppose the simplified spring bag limit of turkeys under Sec. 26-66-12. ...The potential to take 5 state land birds from a single area could be very detrimental to local populations of birds that already experience increased pressure due to public access. Connecticut is not like Maine or Massachusetts where hunting is permitted on land that is not "posted", meaning access is far greater there and a two bird universal limit is appropriate. 20% of all turkey hunters take a full 2 bird limit in Massachusetts according to recent state reports. There is a clear distinction between private and public land that uniquely exists in Connecticut and need to be reflected in the laws. The abundance of private lands, specifically private farms/forests that hold significant amounts of turkeys, merits a distinction from public land in regards to harvests of birds. [sic]" (Christopher Zins)
- "I strongly oppose the combined turkey bag limit of 5 birds during the spring season. Currently, only 2 birds may be harvested on State Land during this period. Under the proposed change, a hunter will be allowed to harvest 250% of the current bag limit on state land which is incredibly excessive and will lead to a select few greedy hunters harvesting too many turkeys from state land locations. [sic]" (Branden Bergeron)
- "I strongly oppose the increase of the spring turkey bag limit. (Tim Nicoletti)
- "I strongly oppose the proposed regulation changes in regards to the turkey hunting bag limits and shooting hours. There are many credible sources that show turkey populations are down across the country and I've personally observed less turkeys around over the last several years in various parts of the state. Expanding the bag limits and hunting hours will only damage the population of one of the best conservation successes in our history. [sic]" (Matthew Kline)
- "I oppose the increased bag limit for turkey. We hunters already have ample/generous bag limits. This increase would potentially have a detrimental effect on the long term viability of the turkey population. If an increase in harvest numbers is your goal, perhaps a longer season or longer hunting hours during the existing spring season may help attain that goal, without more than doubling the current bag limit. [sic]" (Wayne Petroskey)
- "I am opposed to increasing the bag limit for spring turkey hunting on public land from 2 to 5. The intent for bag limits is to manage the wild animals population and allow Sportsman an incredible experience and food source outdoors. I believe a bag limit of five will damage the turkey population and and decrease hunting opportunities for the majority of hunters. [sic]" (Jim Bonosconi)
- "Please reconsider combining the private & state bag limit. As a hunter & concerned citizen I feel this would lead to an uptick in the harvesting of immature birds, which could very likely have a detrimental effect on the stable turkey population we have as today. None of the findings I have seen from the Deep suggest any uptick in population, nor do

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harvest records suggest such notion either. I believe what we have in place is very reasonable...[sic]" (Harrison Hastings)

- "NWTF does not support simultaneously changing the bag limit in spring to allow 5 birds to be taken without regard to public or private lands. The current bag limit of 2 birds on public land and 3 on private land provides a measure of distributing harvest throughout the season among a greater percentage of hunters.

This proposed change could significantly reduce gobbling activity and increase interference among hunters, particularly on public land. A recent survey of CT Turkey hunters indicated that a large percent of hunters either hunt public land exclusively or both private and public land. Increasing the bag limit beyond what is currently available to hunters on public lands has the potential to increase hunter interference, which negatively impacts hunt quality.

Most spring turkey hunter surveys indicate that hearing wild turkeys gobble is a more significant driver of hunt quality than harvesting a gobbler. Removing the bag limit distinctions between private and public lands puts more of a priority on harvesting gobblers than keeping them on the landscape to be heard by hunters throughout the season, particularly on public land.

We are also concerned with such significant changes being made concurrently. While other states have expanded hours during the spring season in recent years they have approached cautiously to allow for analysis of impacts. Combining the expansion of hours with the proposed bag limit changes would make it difficult to tease out which adjustment is having particular impacts on the wild turkey resource and hunting quality.

The NWTF supports CT DEEP's efforts to manage the wild turkey resource and exploring opportunities to recruit, retain and reactivate hunters. We agree that expanding hunting hours is an avenue to increase participation in spring turkey hunting. We do not believe liberalizing the current bag limit structure will be a driver to move the needle with respect to recruiting, retaining and reactivating hunters in CT and we are concerned about the potential impacts of the bag limit adjustment on the wild turkey resource and hunt quality. [sic]" (John June, Connecticut State Chapter president, National Wild Turkey Federation)

Department response: The proposed regulation simplifies the regulations by eliminating distinctions between private and state lands during the spring season. Currently, hunters can access both state and private land with their Resident Game Bird Stamp and have a five-bird bag limit. With this proposed regulation, hunters will still be able to access both state and private land and will still have a five-bird bag limit. Removing the distinction between private and state land will have no significant impact on the overall harvest or on the turkey population. Historically, changes in access to private and state land, or changes to bag limits had no effect on the distribution of the harvest between state and private lands or the distribution of harvest throughout the

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spring season. Spring weather conditions and predator abundance drives turkey population dynamics; the harvest of male turkeys during the spring season has no impact on population abundance in Connecticut. During the past 13 of 15 years, the ratio of juvenile to adult birds in the spring harvest has been consistent at 0.4-0.5 juveniles to adults, indicating no harvest effects on the population. Currently, about 80% of private land hunters and 90% of state land hunters harvest no turkeys during the spring season. Only 2% of turkey hunters are successful at harvesting three birds (current bag limit) on private land and only 3% are successful at harvesting two birds (current bag limit) on state land. Based on current harvest rates, it is predicted that combining the separate bag limits for state and private into a single bag limit of five birds would result in approximately 25 additional male birds being harvested on state lands and 24 additional male birds being harvested on private land. That additional harvest is equivalent to one additional male bird being harvested every 77 square miles and would have no impact on Connecticut turkey population. In a 2016 turkey hunter survey, 68% of hunters supported changing to a five-bird bag limit for private/state land. A study in New York, Pennsylvania, and Ohio found that harvest rates of 30 to 40% of the male population in spring had no effect on the ratio of juveniles to adults in the harvest (no population effect). Currently, less than 10% of the male turkey population is harvested in Connecticut. The bag limit in Connecticut cannot be compared to other states. Hunter numbers, turkey population dynamics, population size, % female harvested, hunter access to land, hunter success rate, and turkey hunting regulations vary among states. The Department will continue to annually collect harvest data and hunter effort data to assess the impacts of regulation changes and will adjust regulations as needed.

Maryland (2011), Pennsylvania (2011), and Maine (2015) have recently expanded the spring turkey hunting season (2nd half or entire spring season) from noon until sunset or ½ hour after sunset. All three states reported no change in overall harvest, no impact on the turkey population, no hunter conflicts, and no issues with hunters shooting birds as they approach the roost. This expansion also provided additional hunting opportunities and hunters seemed appreciative of the change. We expect a similar outcome when Connecticut expands the seasons from noon till sunset. In a 2016, turkey hunter survey, 82% of hunters supported extending the turkey hunting hours till sunset.

This proposal is not expected to influence the amount of hunting activity on state land or significantly affect the spring turkey harvest on state land. Currently, all hunters already have the ability to hunt on private or state land. Historically and currently, most hunting occurs on private land and most of the birds are harvested on private land. Hunter access to private land is regulated by the landowner. Many private lands in Connecticut are closed to hunting. Over the past 30 years, hunter numbers have been declining and the amount of state land open to hunting has been increasing, resulting in lower hunter densities and interference on state lands. From 2009 to 2016, 376 fewer spring turkey permits were issued for state land and 7.4 square miles of state land was purchased/opened to spring turkey hunting. The lottery system for issuing state-land turkey permits was eliminated due to the lack of demand for turkey hunting permits on

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state lands. In addition to hunter numbers declining, hunter effort (total days hunted) on state land dropped from 6,277 total hunting days in 2003 down to 3,678 total hunting days in 2015.

Recommended revisions to proposal: Section 26-66-12(a)(1) should be revised to more clearly eliminate distinctions between private and state lands during the spring season as was intended.

In the first sentence, “the open spring private land season for hunting bearded wild turkey shall” should be replaced with “the open spring season for hunting bearded wild turkeys on private and state lands shall”

In the third sentence, “on private lands for which they have written permission and on state land for which they have a spring season turkey permit.” should be replaced with “on state land or on private lands for which they have written permission from the land owner.”

Also, turkey permits have been replaced with Resident Gamebird Stamps, therefore, “spring season turkey permits” should be replaced with “Resident Gamebird Stamp” in sentences three and four of Section 26-66-12(a)(1).

In the first sentence of Section 26-66-12(a)(1), “hunting and trapping guide” should be capitalized.

Sec. 26-66-13. Seasons, bag limits, and methods for taking amphibians

Recommended revisions to proposal: Although no comments were received concerning this section, the Hearing Officer recommends making minor technical amendments to correct the spelling of *Ambystoma jeffersonianum* and *Scaphiopus h. holbrookii*, and to italicize the genus and species names used in this section to comply with nomenclature standards for scientific names of species. These corrections do not change the meaning of the regulation.

Sec. 26-86a-2. Permits and Tags

Supporting Comment:

“...these proposals are yet another common sense change that augments the availability for individuals to pursue their sport and I am in full support. [*sic*]” (Todd G. Berch)

Department Response: This change eliminates the need to have the appropriate “A” or “B” season identified on a state land deer permit, consistent with the elimination of “A” and “B” seasons as proposed in Section 26-86a-6.

Recommended revisions to proposal: None.

Sec. 26-86a-6. Open Seasons

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Supporting Comments:

- "...these proposals are yet another common sense change that augments the availability for individuals to pursue their sport and I am in full support. [*sic*]" (Todd G. Berch)
- "I would support Sec.26-86a-6 regulation eliminating the need to have both an 'A' and 'B' season." (Ron Szrejna)

Department response: Elimination of the "A" and "B" seasons (nine days each) for state land shotgun deer hunting allow hunters a total of 18 days to hunt on state land rather than only nine under the "A" or "B" season approach.

Recommended revisions to proposal: None

Hearing Officer's Summary

The Department received 16 public comments regarding the proposed amendments coming from 14 individuals and two organizations. No one from the public attended the public hearing held May 29, 2019 to provide additional comments. The Department provided responses to public comments above. Revisions to the proposed amendments were made to

- change the first sentence in 26-55-7(b)(1), removing the phrase "have a permit from" and replacing it with "be permitted by";
- clarify Section 26-66-12(a)(1) eliminating distinctions between private and state lands during the spring turkey hunting season, replacing "spring season turkey permits" with "Resident Gamebird Stamp", and capitalizing "hunting and trapping guide";
- make corrections to species nomenclature and spelling in Sections 26-66-3(f), 26-66-7(c), 26-66-13(a), and 26-66-(b);
- replace the term "quadruped(s)" with mammal(s), in Sections 26-66-1(a), 26-66-1(j) and in the title of Section 26-66-3;
- correct the spelling of "southernmost" in section 26-6-4(w)(4);
- change Commissioner to all lower case letters throughout; and
- change "Commissioner of Environmental Protection" to "Commissioner of Energy and Environmental Protection" in Sec. 23-5c-1(a)(1)(A).

Based on a review of the proposed amendments, comments from the public and the Department responses, the Hearing Officer recommends that the Commissioner of Energy and Environmental Protection proceed with the proposed amendments to the Regulations of Connecticut State Agencies as revised.

M. Katherine Moran
Wildlife Biologist
DEEP, Bureau of Natural Resources


Signature

7/16/19
Date